

1 MORGAN, LEWIS & BOCKIUS LLP  
 2 Kevin M. Papay, Bar No. 274161  
 3 kevin.papay@morganlewis.com  
 4 One Market, Spear Street Tower  
 5 San Francisco, CA 94105-1596  
 Tel: +1.415.442.1000  
 Fax: +1.415.442.1001

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 9 Attorneys for Petitioner  
 RIVER FINANCIAL INC.  
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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

RIVER FINANCIAL INC., a Delaware corporation,

Petitioner,

v.

JONATHAN ZHOU, an individual,

Respondent.

Case No.

**DECLARATION OF WILLIAM MONGAN IN SUPPORT OF CLAIMANT RIVER FINANCIAL INC.'S MOTION TO CONFIRM ARBITRATION AWARD**

**DECLARATION OF WILLIAM MONGAN**

I, William Mongan, Esq., declare and state as follows:

1. I am the General Counsel of River Financial Inc. I have personal knowledge of the facts set forth in this declaration, and if I were called as a witness, I could and would testify competently to them.

2. Attached as **Exhibit 1** is a true and correct copy of River Financial Inc.’s Terms of Service, with an effective date of October 4, 2023. These were the operative terms of service governing access to and use of River Financial Inc.’s website and related services, applications, and content provided by River Financial Inc. on or about February 2, 2024, the date that Jonathan Zhou (“Mr. Zhou”) established an account with River Financial Inc. to buy and sell Bitcoins.

3. Attached as **Exhibit 2** is a true and correct copy of a demand letter that I sent to Jonathan Zhou on behalf of River Financial Inc. on or about April 9, 2024, demanding payment for the Bitcoins delivered to Mr. Zhou in February and March of 2024.

4. Attached as **Exhibit 3** is a true and correct copy of the demand for arbitration that River Financial Inc. made on Mr. Zhou on or about April 22, 2024.

5. Attached as **Exhibit 4** is a true and correct copy of the Pre-Hearing Order No. 1 that was issued on or about September 5, 2024 by the Honorable Robert A. Baines (Ret.), our arbitrator for the JAMS arbitration between River Financial Inc. and Mr. Zhou.

6. Attached as **Exhibit 5** is a true and correct copy of the Final Award entered by the Honorable Robert A. Baines (Ret.) following a JAMS arbitration hearing between River Financial Inc. and Mr. Zhou on October 18, 2024. The arbitration hearing proceeded as described in the Final Award. I represented River Financial Inc. at the arbitration hearing, along with outside counsel Michael D. Wright, Esq., of Savage Royall & Sheheen LLP.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March  
10, 2025.

By William Mongan  
William Mongan